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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; and VERA BRADLEY DESIGNS, INC., an Indiana corporation,

Plaintiffs,

v.

ZHEN WANG "JOHNNY" ZHANG, an individual; FABBY GLOBAL TRADING, LLC d/b/a/ "CALIBEAN COLLECTION," a Texas limited liability corporation; and JOHN DOES 1 - 10,

Defendants.

No. 2:18-CV-00352

STIPULATED ORDER GRANTING PARTIES' JOINT STIPULATED MOTION TO DEFER EXPERT DISCLOSURE REQUIREMENTS RELATED TO REQUESTS FOR ATTORNEYS' FEES AND COSTS

Plaintiffs Amazon.com, Inc. and Vera Bradley Designs, Inc. ("Plaintiffs"), and Defendants Zhen Wang "Johnny" Zhang and Fabby Global Trading, LLC d/b/a/ "Calibean Collection" ("Defendants") (collectively, "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Parties have agreed that it would be most expeditious and cost-efficient to submit expert disclosure requirements related to a request for attorneys' fees and costs, including evidence supporting requests and entitlement for attorney fees and costs in an exceptional case, *e.g.*, redacted invoices, 15 days after the verdict or final judgment, whichever is earlier;

NOW, THEREFORE, IT IS STIPULATED that the Court enter the following order with regard to expert disclosures related to a request for attorneys' fees and costs:

The Parties' submission on expert disclosure requirements related to a request for attorneys' fees and costs, including evidence supporting requests and entitlement for attorney fees and costs in an exceptional case, may be deferred until 15 days after the verdict or final judgment, whichever comes earlier.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

| 9 | Dated this 12th day of July 2019. | By: /s/ Zana Z. Bugaighis |
|----|-----------------------------------|---|
| 10 | | Bonnie E. MacNaughton, WSBA #36110 |
| 10 | | Zana Z. Bugaighis, WSBA #43614 |
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| 17 | | Attorneys for Plaintiffs Amazon.com, Inc. and |
| 18 | | Vera Bradley Designs, Inc. |
| 10 | | |

Dated this 12th day of July 2019.

By: /s/ Susan D. Pitchford
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Douglas H. Elliott, *Pro Hac Vice* Nathan Q. Huynh, *Pro Hac Vice* Merry R. Harrison, *Pro Hac Vice*

STIPULATED ORDER GRANTING PARTIES' JOINT STIPULATED MOTION TO DEFER EXPERT DISCLOSURE REQUIREMENTS RELATED TO REQUESTS FOR ATTORNEYS' FEES AND COSTS - Page 2

| 1 2 3 4 5 6 7 | ELLIOTT & POLASEK, PLLC 6750 West Loop South, Suite 995 Bellaire, TX 77401 Tel: (832) 485-3507 Fax: (832) 485-3511 Email: doug@elliottiplaw.com nathan@elliottiplaw.com merry@epiplawyers.com Attorneys for Defendants Zhenwang Zhang, |
|---------------------------------|---|
| 8 | Fabby Global Trading, LLC and Universal Expo Group, Inc. |
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| 11 | <u>ORDER</u> |
| 12 | PURSUANT TO STIPULATION, IT IS SO ORDERED. |
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| 14 | Dated: July 16, 2019. |
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| 16 | RICARDO S. MARTINEZ |
| 17 | CHIEF UNITED STATES DISTRICT JUDGE |
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STIPULATED ORDER GRANTING PARTIES' JOINT STIPULATED MOTION TO DEFER EXPERT DISCLOSURE REQUIREMENTS RELATED TO REQUESTS FOR ATTORNEYS' FEES AND COSTS - Page 3

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